UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Alexandria Division

ANAS ELHADY, et al,)
	Plaintiffs,) Civil No. 1:16cv375
v.)
CHARLES KABLE, et al.	Defendants.))
)

DEFENDANTS' MOTION FOR A PROTECTIVE ORDER GOVERNING ACCESS TO, HANDLING OF, AND DISPOSITION OF LAW ENFORCEMENT PRIVILEGED INFORMATION

Pursuant to Federal Rule of Civil Procedure 26(c)(1), Defendants hereby seek the entry of the attached proposed Protective Order Governing Access to, Handling of, and Disposition of Law Enforcement Privileged Information. The reasons supporting this motion are stated in the accompanying memorandum.

As required by the local rules and the Court's scheduling order, Defendants have conferred in good faith with Plaintiffs in an attempt to resolve the discovery disputes at issue. The parties were unable to reach agreement.

Dated: March 1, 2019 Respectfully submitted,

G. ZACHARY TERWILLIGER United States Attorney

JOSEPH H. HUNT Assistant Attorney General Civil Division

ANTHONY J. COPPOLINO Deputy Director, Federal Programs Branch AMY POWELL
DENA M. ROTH
ANTONIA KONKOLY
CHRISTOPHER HEALY
Trial Attorneys, Federal Programs Branch
United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue NW, Room 7324
Washington, DC 20530
Tel: (202) 514-2395
amy.powell@usdoj.gov
dena.m.roth@usdoj.gov
antonia.konkoly@usdoj.gov
christopher.healy@usdoj.gov

/s/ Lauren A. Wetzler
LAUREN A. WETZLER
Chief, Civil Division
Assistant United States Attorney
2100 Jamieson Ave.,
Alexandria, VA. 22314
Tel: (703) 299-3752
Fax: (703) 299-3983

Lauren. Wetzler@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2019, I filed the foregoing via the CM/ECF system, which will send a Notification of Electronic Filing to all counsel of record.

/s/ Lauren A. Wetzler
LAUREN A. WETZLER
Chief, Civil Division
Assistant United States Attorney
2100 Jamieson Ave.,
Alexandria, VA. 22314
Tel: (703) 299-3752
Fax: (703) 299-3983